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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JESSICA MARTINEZ-ARRIAGA, an individual,

Plaintiff,  
v.

BRIGGS MANAGEMENT LLC, d/b/a and a/k/a Fat Tuesday; BRIGGS MANAGEMENT, INC., d/b/a and a/k/a Fat Tuesday; and DOES 1 through 50, inclusive,

Defendants.

Case No.: 2:23-cv-01845-JAD-NJK

**STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

**(FOURTH REQUEST) --- ECF No. 46**

Plaintiff, JESSICA MARTINEZ-ARRIAGA, by and through her counsel of record, RAFII & ASSOCIATES, P.C., and Defendants BRIGGS MANAGEMENT INC. AND BRIGGS MANAGEMENT LLC, ("Defendants") by and through their counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, submit the following Stipulation to Extend Time for Plaintiff's Response to Defendants' Motion for Summary Judgment:

1. The Court granted the Parties' first stipulation on July 24, 2024, extending the time for Plaintiff's response from July 29, 2024, to August 5, 2024. [ECF No. 41.]

2. On July 31, 2024, the Court granted the Parties' second stipulation on July 30, 2024, extending the time for Plaintiff's response from August 5, 2024, to August 14, 2024. [ECF No. 43.]

3. On August 13, 2024, the Court granted the Parties' third stipulation on August 12,



2024, extending the time for Plaintiff's response from August 14, 2024, to August 23, 2024. [ECF No. 45.]

4. The Parties' second stipulation [ECF No. 42] is incorporated herein by reference. As explained in the Parties' second stipulation, Plaintiff's lead counsel Jason Kuller is with his long-term partner at the Cleveland Clinic in Ohio while she undergoes testing and treatment for a rare and debilitating medical condition. Mr. Kuller's partner is currently unable to ambulate without a wheelchair or seated rollator, and relies on Mr. Kuller as her primary caregiver.

5. The Parties' third stipulation [ECF No. 44] is incorporated herein by reference. Mr. Kuller's partner has been in out of the Cleveland Clinic and emergency room. Mr. Kuller's partner was admitted to the emergency room on Thursday, August 22, 2024, and is presently still there. Mr. Kuller has been by her side as a result of his caregiving responsibilities, and as such Mr. Kuller does not know when he will return to Las Vegas, but has been working on the Opposition as time permits. Mr. Kuller has been unable to devote sufficient time to brief Plaintiff's opposition to Defendants' summary judgment motion. Mr. Kuller anticipates being able to complete Plaintiff's response no later than Tuesday, August 27, 2024. Plaintiff's counsel will file her opposition earlier, if possible.

6. Plaintiff's counsel thus needs additional time to prepare and finalize Plaintiff's opposition, and Defendants' counsel has graciously agreed to the additional extension.

7. This is the fourth request for an extension of time for Plaintiff to file her response to Defendants' Motion for Summary Judgment.

8. This request is made in good faith and not for the purpose of delay.

WHEREFORE, the Parties respectfully request that this Court **extend the time for Plaintiff to file her Opposition to Defendants' Motion from August 23, 2024, to August 27, 2024.**

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1 RESPECTFULLY SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

2 **DATED this 23<sup>rd</sup> day of August, 2024.**

**DATED this 23<sup>rd</sup> day of August, 2024.**

3  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP

RAFII & ASSOCIATES, P.C.

5 /s/ Jeffrey D. Winchester

/s/ Jason Kuller

6 JEFFREY D. WINCHESTER

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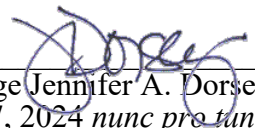
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9 Attorneys for DEFENDANTS BRIGGS  
10 MANAGEMENT LLC and BRIGGS  
11 MANAGEMENT, INC.

Attorneys for PLAINTIFF  
JESSICA MARTINEZ-ARRIAGA

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14 **ORDER**

15 Based on the parties' stipulation  
16 [ECF No. 46] and good cause appearing,  
17 IT IS ORDERED that **plaintiff's deadline**  
18 **to file an opposition to the motion for**  
19 **summary judgment [ECF No. 39] is**  
20 **extended to August 27, 2024.**

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23 U.S. District Judge Jennifer A. Dorsey  
Dated: August 27, 2024 *nunc pro tunc* to  
24 August 23, 2024

